

November 20, 2002

RE: Ottenweller Company, Inc 003-16044-00224
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

November 20, 2002

Mr. Michael Ottenweller
Ottenweller Company, Inc.
3011 Congressional Parkway
Fort Wayne, Indiana 46808

Re: 003-16044
First Administrative Amendment to
Part 70 003-7440-00224

Dear Mr. Ottenweller:

Ottenweller Company, Inc. was issued a Part 70 permit on March 20, 1998 for a surface coating of fabricated metal parts. A letter requesting the installation of the following insignificant activities with PTE of 1.7 tons of NO_x per year was received on September 3, 2002. The application also includes the relocation of the surface coating operation to a new building that is part of the source. These activities qualify as "revisions to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (changes are **bolded** and deletions are ~~struck through~~ for emphasis):

- (a) One (1) natural gas-fired combination of dry off and cure oven, identified as BO1, with a maximum combined capacity of 3.3 million British thermal units per hour (mmBtu/hr), exhausting to stacks 6 and 7; and
- (b) One (1) natural gas-fired small mobile washer, with a maximum heat input capacity of 0.55 mmBtu/hr.

Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary

- (1) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB₁, using dry filters as control, ~~exhausting to two (2) stacks (S_{1A} and S_{1B});~~
- (2) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB₂, using dry filters as control, ~~exhausting to two (2) stacks (S_{2A} and S_{2B});~~ and
- (3) Three (3) natural gas-fired water heaters (boilers), identified as WH_{1A}, WH_{1B}, WH₂, **Stage 1** with a maximum **heat input** capacity of 2.5 mmBtu/hr, **Stage 3 with a maximum heat input capacity of 2.5 mmBtu/hr** and **Stage 5 with a maximum heat input capacity of 1.5 mmBtu/hr** respectively, exhausting to ~~three (3) stacks (S_{WH1A}, S_{WH1B}, S_{WH2})~~ **1, 2, 3, 4, 5, and 10.**

Section A.3 is amended to list the above insignificant activities as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(4)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) natural gas-fired burn off oven, identified as BU1, with a maximum capacity of 1.6 million British thermal units per hour, exhausting to one ~~(1) stack (S_{BU1})~~;
- (2) **One (1) natural gas-fired combination of dry off and cure oven, identified as BO1, with a maximum combined capacity of 3.3 million British thermal units per hour (mmBtu/hr), exhausting to stacks 6 and 7; and**
- (3) **One (1) natural gas-fired small mobile washer, with a maximum heat input capacity of 0.55 mmBtu/hr.**

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB₁, using dry filters as control, ~~exhausting to two (2) stacks (S_{1A} and S_{1B})~~;
- (2) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB₂, using dry filters as control, ~~exhausting to two (2) stacks (S_{2A} and S_{2B})~~; and
- (3) Three (3) natural gas-fired water heaters (boilers), identified as ~~WH_{1A}, WH_{1B}, WH₂~~, **Stage 1** with a maximum **heat input** capacity of 2.5 mmBtu/hr, **Stage 3 with a maximum heat input capacity of 2.5 mmBtu/hr** and **Stage 5 with a maximum heat input capacity of 1.5 mmBtu/hr** respectively, exhausting to ~~three (3) stacks (S_{WH1A}, S_{WH1B}, S_{WH2})~~ **1, 2, 3, 4, 5, and 10.**

All conditions of the Part 70 permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

APD

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Ottenweller Company, Inc.
3011 Congressional Parkway
Fort Wayne, Indiana 46808**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7440-00224	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 20, 1998
Part 70 Permit Renewal No.: 003-15688-00224	Issuance Date: Pending
First Administrative Amendment No.: 003-16044	Pages Affected: 5, 28, 29, 30, 31 Pages Added: 5a
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: November 20, 2002

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fabricated metal surface coating operation.

Responsible Official: Michael W. Ottenweller
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
Mailing Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
SIC Code: 3469
County Location: Allen
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB₁, using dry filters as control;
- (2) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB₂, using dry filters as control; and
- (3) Three (3) natural gas-fired water heaters (boilers), identified as Stage 1 with a maximum heat input capacity of 2.5 mmBtu/hr, Stage 3 with a maximum heat input capacity of 2.5 mmBtu/hr and Stage 5 with a maximum heat input capacity of 1.5 mmBtu/hr exhausting to stacks 1, 2, 3, 4, 5, and 10.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) natural gas-fired burn off oven, identified as BU1, with a maximum capacity of 1.6 million British thermal units per hour, exhausting to one;
- (2) One (1) natural gas-fired combination of dry off and cure oven, identified as BO1, with a maximum combined capacity of 3.3 million British thermal units per hour (mmBtu/hr), exhausting to stacks 6 and 7; and
- (3) One (1) natural gas-fired small mobile washer, with a maximum heat input capacity of 0.55 mmBtu/hr.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (1) It is a major source, as defined in 326 IAC 2-7-1(22).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB₁, using dry filters as control;
- (2) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB₂, using dry filters as control; and

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the two (2) paint booths (PB-1 and PB-2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coating.
- (b) Solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the paint booths and their control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) and volatile organic compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in place at all times when the two (2) paint booths (PB-1 and PB-2) are in operation.

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 and PB-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -

Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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SECTION D.2 FACILITY OPERATION CONDITIONS

- (3) Three (3) natural gas-fired water heaters (boilers), identified as Stage 1 with a maximum heat input capacity of 2.5 mmBtu/hr, Stage 3 with a maximum heat input capacity of 2.5 mmBtu/hr and Stage 5 with a maximum heat input capacity of 1.5 mmBtu/hr exhausting to stacks 1, 2, 3, 4, 5, and 10.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the three (3) natural gas-fired water heaters (boilers) shall be limited to 0.6 pounds per mmBtu heat input. This limitation is used because the calculated limitation was greater than 0.60 pounds per million Btu.

The calculated limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

SECTION D.3 FACILITY OPERATION CONDITIONS

- | |
|---|
| (1) One (1) natural gas-fired burn off oven, identified as BU1, with a maximum capacity of 1.6 million British thermal units per hour, exhausting to one stack. |
|---|

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter [326 IAC 4-2-2]

That pursuant to 326 IAC 4-2-2 (Incinerators), this natural gas-fired burnoff oven, rated at 1.6 million British thermal units per hour shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).
- (d) Be maintained properly as specified by the manufacturer and approved by IDEM.
- (e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.
- (h) Not create a nuisance or fire hazard.
- (i) Not emit particulate matter (PM) in excess of 0.3 pound per 1000 pounds of dry exhaust gas corrected to 50 percent excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 1 of 1 TSD App A

Company Name: Ottenweller Company, Inc.
Address City IN Zip: 3011 Congressional Parkway, Fort Wayne, IN 46808
Administrative Amendment No.: 003-16044
Pit ID: 003-00224
Reviewer: Aida De Guzman
Date Application Received: Sept. 26, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.9
1 dry off oven @ 0.8 mmBtu/hr
1 cure oven @ 2.5 mmBtu/hr
1 mobile washer @ 0.55 mmBtu/hr

33.7

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.0	0.1	0.0	1.7	0.1	1.4

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).